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EASTERN DISTRICT OF LOUISIANA

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY TO COMMIT
MAIL FRAUD AND FALSE STATEMENTS TO A FEDERAL AGENT**

UNITED STATES OF AMERICA

v.

SEAN HUNTER
SHAUNA CROWDEN HUNTER
a/k/a Shauna Crowden
a/k/a Shauna Hunter-Crowden
a/k/a Shauna Desha Crowden

* CRIMINAL NUMBER

* SECTION:

* VIOLATION: 18 U.S.C. § 371

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* * *

10-261
SECT. K MAG. 5

The U. S. Attorney charges that:

COUNT 1

**CONSPIRACY TO COMMIT MAIL FRAUD
AND FALSE STATEMENTS TO A FEDERAL AGENT**

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about February 15, 2005, the defendant, **SHAUNA CROWDEN HUNTER**, entered into a Lease Agreement with BMW Financial Services for the purchase of a new 2005 BMW 525i, Vehicle Identification Number WBANA53585B861734 (hereinafter BMW), with a retail value of \$53,377.27.

2. On or about March 7, 2005, the state of Louisiana issued Louisiana license plate NPT 591 for the BMW.

3. On or about August 8, 2005, defendant, **SHAUNA CROWDEN HUNTER**, contracted with Auto Club Inter-Insurance Exchange (AAA) to provide automotive insurance on the BMW.

4. On August 29, 2005, Hurricane Katrina made landfall with the Gulf Coast of Louisiana.

5. On or about September 27, 2005, defendant **SHAUNA CROWDEN HUNTER**, reported to the AAA insurance company that the BMW was completely destroyed during Hurricane Katrina and was last parked in front of her house at 12641 North Lake Carmel Drive in New Orleans, Louisiana.

6. On or about November 8, 2005, the AAA insurance company mailed to Shauna Crowden check no. 80401854, in the amount of \$3,442.61, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

7. On or about November 11, 2005, the AAA insurance company mailed to BMW Financial Services check no. 80402657, in the amount of \$51,908.74, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

8. In June 2006, defendant, **SEAN HUNTER** was named Interim Director of Aviation for the Louis Armstrong International Airport (hereinafter the "Airport") and was made the permanent Director of Aviation in June 2007.

9. On or about July 3, 2006, the defendants, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER**, were married in the U.S. Virgin Islands and lived together at 3735 Pin Oak Avenue in New Orleans, Louisiana.

10. On or about October 13, 2008, at approximately 7:04 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of South Carrollton Avenue and Palmetto Street in New Orleans.

11. On or about October 25, 2008, at approximately 2:33 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of St. Charles Avenue and Martin Luther King Jr. Blvd in New Orleans.

12. On or about October 27, 2008, at approximately 9:44 a.m., the BMW entered the short term parking garage at the Airport.

13. On or about April 9, 2009, law enforcement officers located the BMW hidden in a parking garage located at the Airport and the BMW odometer reflected approximately 29,900 miles.

14. On or about June 25, 2009, the Airport was served with a federal grand jury subpoena for certain records involving **SEAN HUNTER's** BMW.

15. On or about September 16, 2009, **SEAN HUNTER** resigned from his position as Director of Aviation at the airport.

B. THE SCHEME TO DEFRAUD

Beginning on or about September 5, 2005, and continuing to the date of this indictment, in the Eastern District of Louisiana and elsewhere, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and/or property to wit: money and the use of a 2005 BMW 525i luxury sedan that belonged to AAA, by means of false pretenses, promises and representations thereby defrauding the AAA insurance company of its money and/or property.

It was a part of the scheme and artifice to defraud that **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER** colluded together and made multiple misrepresentations to the AAA insurance company, and others, to conceal, cover-up, and hide their continued use of the BMW, thereby defrauding AAA of their residual value and equity in the fraudulently obtained BMW.

It was further a part of the scheme and artifice to defraud that on or about September 5, 2005, **SHAUNA CROWDEN HUNTER** contacted the AAA insurance company to initiate a claim with respect to her BMW.

It was further a part of the scheme and artifice to defraud that on or about September 27, 2005, **SHAUNA CROWDEN HUNTER** told AAA that her BMW was completely submerged and was a total loss.

It was further a part of the scheme and artifice to defraud that **SHAUNA CROWDEN HUNTER** continued to exercise control over the BMW.

It was further a part of the scheme and artifice to defraud that on or about October 14, 2005, **SHAUNA CROWDEN HUNTER** falsely completed and mailed a notarized Odometer Statement with respect to the BMW, thereby transferring title of the BMW to AAA.

It was further a part of the scheme and artifice to defraud that on or about December 14, 2005, **SHAUNA CROWDEN HUNTER** told AAA that her BMW was located in front of her residence at 12641 North Lake Carmel Drive, New Orleans, Louisiana.

It was further a part of the scheme and artifice to defraud that on or about January 5, 2006, **SHAUNA CROWDEN HUNTER** told AAA that she had last seen her BMW prior to Hurricane Katrina at 12641 North Lake Carmel Drive and that she had no idea of the current location of the BMW.

It was further a part of the scheme and artifice to defraud that on or about July 20, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER** purchased another luxury vehicle and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the location of the BMW from law enforcement and insurance officials, including AAA.

It was further a part of the scheme and artifice to defraud that on or about July 20, 2007, **SEAN HUNTER** executed, under oath, a Louisiana Department of Public Safety and Corrections Office of Motor Vehicles Vehicle Application, and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that on or about July 30, 2007, **SEAN HUNTER**, who was then the Director of Aviation for the Airport contacted a subordinate employee and instructed that employee to issue him a Vehicle Inspection Sticker for the BMW.

It was further a part of the scheme and artifice to defraud that on or about July 30, 2007, an employee of the Airport issued **SEAN HUNTER**, at the Airport's expense, a 2007 Kenner Vehicle Inspection Sticker No. 27115 to place on the BMW in an effort to conceal the scheme from law enforcement and insurance officials.

It was further a part of the scheme and artifice to defraud that at an unknown time but after or on or about July 30, 2007, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, placed a Kenner Vehicle Inspection Sticker No. 27115 on the BMW in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that on or about October 1, 2007, **SHAUNA CROWDEN HUNTER** provided a false address of 12461 Polar Street, New Orleans, Louisiana to Peake BMW in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that in May or June 2008, **SEAN HUNTER**, in his capacity as Director of Aviation for the Airport, instructed the General Manager who was in charge of the parking garage at the airport not to remove or tow his black BMW with license plate NPT 591 from the airport garage.

It was further a part of the scheme and artifice to defraud that on or about October 27, 2008, at approximately 9:44 a.m., **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, parked the BMW at the Airport short term parking garage in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that on or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said she no longer lived in New Orleans, that she moved to Washington, D. C., and she provided a false address.

It was further a part of the scheme and artifice to defraud that on or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said the BMW was located in a tow yard in Kenner.

It was further a part of the scheme and artifice to defraud that on or about June 2, 2009, **SEAN HUNTER** contacted an investigator with AAA and asked the investigator what he had to do to keep his wife from going to jail.

It was further a part of the scheme and artifice to defraud that on or about October 16, 2009, **SEAN HUNTER** contacted a federal witness and attempted to influence that witness's testimony in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that on or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation in an effort to conceal the scheme to defraud.

C. THE CONSPIRACY

Beginning at an unknown time but prior to July 2007, and continuing until the date of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, and agree together and with each other to:

1. use, and cause to be used, the United States Mail and commercial interstate carriers in furtherance of the scheme and artifice to defraud and to conceal the scheme and artifice to defraud set forth in Section B; in violation of Title 18, United States Code, Section 1341; and
2. make false statements to the Federal Bureau of Investigation; in violation of Title 18, United States Code, Section 1001.

D. OVERT ACTS

On or about the following dates, in the Eastern District of Louisiana and elsewhere, defendants, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, committed the following overt acts, among others, in furtherance of the above described conspiracy:

1. On or about July 20, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER** purchased another luxury vehicle and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the true location of the BMW from insurance officials and law enforcement.
2. On or about July 20, 2007, **SEAN HUNTER** executed, under oath, a Louisiana Department of Public Safety and Corrections, Office of Motor Vehicles (LADPSC-OMV), Vehicle Application, and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the true location of the BMW from insurance officials and law enforcement.
3. In or about October 2007, **SEAN HUNTER** caused to be mailed to the LADPSC-OMV, Baton Rouge, Louisiana, a vehicle registration application and a UCC Financing Statement that contained a false address of 805 Vouray Drive, Kenner, Louisiana.

4. On or about July 30, 2007, **SEAN HUNTER**, who was then the Director of Aviation for the Airport contacted a subordinate employee and instructed that employee to issue him a Vehicle Inspection Sticker for the BMW.

5. On or about July 30, 2007, a employee of the Airport issued to **SEAN HUNTER**, at the Airport's expense, a 2007 Kenner Vehicle Inspection Sticker No. 27115 for the BMW.

6. At a date unknown, but after on or about July 30, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER**, placed Kenner Vehicle Inspection Sticker No. 27115 on the BMW.

7. On or about October 1, 2007, **SHAUNA CROWDEN HUNTER** provided a false address of 12641 Polar Street, New Orleans, Louisiana to Peake BMW when she had the BMW serviced.

8. In May or June 2008, **SEAN HUNTER**, in his capacity as Director of Aviation for the Airport, instructed the General Manager in charge of the parking garage at the Airport not to remove or tow his black BMW with license plate NPT 591 from the garage.

9. On or about October 27, 2008, at approximately 9:44 a.m., **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, parked the BMW at the Airport short term parking garage in an effort to hide the BMW.

10. On or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said she no longer lived in New Orleans, she moved to Washington, D. C., and she provided him with a false address.

11. On or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said the BMW was located in an impound yard in Kenner, Louisiana.

12. On or about June 2, 2009, **SEAN HUNTER** contacted an investigator with AAA and asked the investigator if there was a way to keep his wife from going to jail.

13. On or about October 16, 2009, **SEAN HUNTER** contacted an individual who **SEAN HUNTER** knew was a witness in the federal criminal investigation into himself and his wife and **SEAN HUNTER** endeavored to obstruct justice by seeking to influence the witness's testimony.

14. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he had registered his other luxury vehicle, the Land Rover LR3, at his Pin Oak address.

15. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he had registered his other luxury vehicle, the Land Rover LR3, at a post office box at the airport.

16. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he requested a brake tag from the airport for his other luxury vehicle, the Land Rover LR3, and not for the BMW, when in fact **HUNTER** had requested and placed the brake tag on the BMW.

All in violation of Title 18, United States Code, Section 371.

NOTICE OF MAIL FRAUD FORFEITURE

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendants, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1341.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

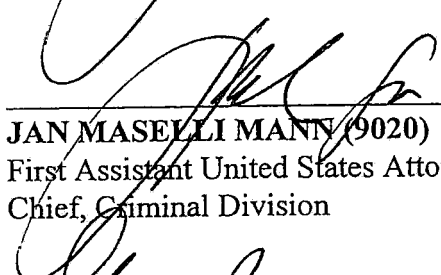
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

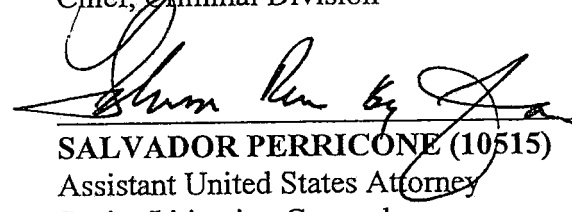
All in violation of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).



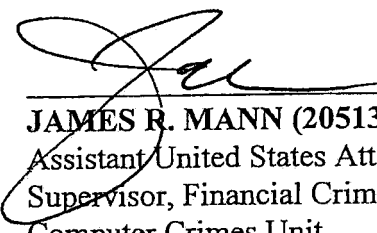
JIM LETTEN (8517)
United States Attorney



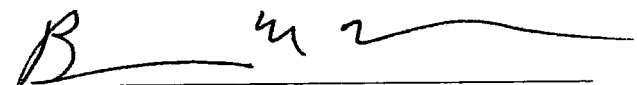
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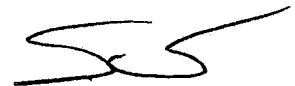
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New Orleans, Louisiana
August 27, 2010